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*Attorneys for ROE CL Plaintiffs*

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

Case No.: 3:23-md-03084-CRB

Hon. Charles R. Breyer

This Document Relates to:

*Jane Roe CL 32 v. Uber Technologies,  
Inc., et al., No. 3:24-cv-05596-CRB*

*Jane Roe CL 36 v. Uber Technologies,  
Inc., et al., No. 3:24-cv-05720-CRB*

*Jane Roe CL 42 v. Uber Technologies,  
Inc., et al., No. 3:24-cv-05740-CRB*

*Jane Roe CL 45 v. Uber Technologies,  
Inc., et al., No. 3:24-cv-05746-CRB*

*Jane Roe CL 61 v. Uber Technologies,  
Inc., et al., No. 3:24-cv-05850-CRB*

*Jane Roe CL 78 v. Uber Technologies,  
Inc., et al., No. 3:24-cv-07584-CRB*

*Jane Roe CL 82 v. Uber Technologies,  
Inc., et al., No. 3:24-cv-08522-CRB*

*Jane Roe CL 143 v. Uber Technologies,  
Inc., et al., No. 3:25-cv-03260-CRB*

**ATTORNEY JENNIFER S. DOMER'S  
DECLARATION IN SUPPORT OF  
OPPOSITION TO DEFENDANTS'  
MOTION FOR ORDER TO SHOW  
CAUSE AND CASE MANAGEMENT  
ORDER**

Date: September 19, 2025  
Time: 10:00 a.m.  
Courtroom: 6 – 17<sup>th</sup> Floor

1 I, Jennifer S. Domer, declare as follows:

2 1. I am an attorney at Cutter Law P.C. admitted to practice before the courts of the  
3 State of California. I am a Partner at Cutter Law, P.C., and am one of the counsels of record for  
4 all filed Jane Roe CL claimants. I have personal knowledge of the matters set forth herein, and if  
5 called to testify, I would testify competently as to the information below.

6 2. This declaration is made in support of the Opposition to Defendants' Motion.

7 3. Counsel works with Plaintiffs to help them locate trip receipts as well as obtain  
8 information needed to complete the PTO 5 ride information form, which Counsel then produces,  
9 and Defendants issue a Defendant Fact Sheet.

10 4. The Defendant Fact Sheet may indicate whether an account for person has been  
11 located, and whether the ride was located with the information provided in the PTO 5 form.

12 5. Counsel then works with Plaintiffs to see if there is any additional information  
13 that can be provided or ways that the information can be obtained, and if so, Counsel produces  
14 an Amended PTO 5 form for that Plaintiff.

15 6. Of the six Plaintiffs subject to Defendants' Motion, two Plaintiffs submitted an  
16 Amended PTO 5 form, MDL ID 2091 and 2703, prior to the filing of Defendants' Motion or any  
17 Deficiency Notice.

18 7. Plaintiff MDL ID 2091 received an Amended Defendant Fact Sheet indicating  
19 that an account was now located, but the ride was not.

20 8. Counsel received a Notice of Deficient or Incomplete Ride Receipt on July 17,  
21 2025, for Plaintiffs, MDL ID 2091, 2106, and 2123. To which Counsel began reaching out to  
22 Plaintiffs regarding any additional information that could be provided for the PTO 5 form.

23 9. Thirteen days after receiving the Deficiency Notice, Defendants filed their  
24 Motion for Entry of an Order to Show Cause and Case Management Order for failure to provide  
25 a Bona Fide Receipt on July 30, 2025.

26 10. Plaintiffs, MDL ID 2095, 2682, and 2703, never received any kind of deficiency  
27 notice in MDL Centrality as to their information forms, and were notified via Defendants notice  
28 of motion on July 22, 2025, that their responses were deficient and would be subject to them

1 Motion they then filed on July 30, 2025.

2 I declare under penalty of perjury that the foregoing is true and correct, and that this  
3 declaration was executed on August 27, 2025, in Sacramento, California.

4  
5 Dated: August 27, 2025

CUTTER LAW P.C.

6  
7 By: /s/ Jennifer S. Domer

8 Jennifer S. Domer

9 *Attorney for Jane Roe CL Plaintiffs*  
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